



Apparel Care and
the Environment
Alternative Technologies and Labeling



Session III

FTC Care Labeling Revisions

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Federal Trade Commission

Ms. Vecellio is an attorney in the Division of Enforcement of the Bureau of Consumer Protection at the Federal Trade Commission. For the last several years, her responsibilities have included enforcing the Commission's Care Labeling Rule, which requires care labels on textile wearing apparel. Ms. Vecellio has a J.D. from Harvard Law School and a B.A. cum laude in Economics from University of North Carolina-Chapel Hill.

I'm an attorney at the Federal Trade Commission, and one of the main things I do is enforce the Care Labeling Rule. Also, in recent years, thanks to those of you in this room, I also work on the amendment of the Care Labeling Rule.

I want to tell you a little about the history of the rule, why it was promulgated, when it was promulgated, and when it was amended. I'd like to tell you what it does and does not do. Then, I'm going to tell you a little about the history of the current revisions we're working on, and the kind of information that's relevant to those current revisions. These revisions include revising the rule to allow for labeling for professional wet cleaning; and possibly revising the rule to require that any garment that can be laundered at home be so labeled. Also, revising the rule to allow the use of symbols in lieu of words.

The rule was promulgated in 1971 by the Federal Trade Commission. The Federal Trade Commission is composed of five commissioners appointed by the President. I am required to tell you that the opinions I express today are my own, and do not necessarily represent the view of the Commission or of any individual commissioner, although I hope they do. Our basic statutory authority is to prevent unfair deceptive acts or practices in commerce. In 1971, the Commission promulgated the Care Labeling Rule, saying that it was unfair and deceptive to fail to include care instructions on garments. The Commission has said that the rule is intended "to assist consumers in making informed purchase decisions, and to enable consumers and cleaners to avoid product damage." The rule only requires that one method of cleaning be given. That method can be either washing or dry cleaning. The rule does not require that directions for both be given on a label, even if a garment could be cleaned in both ways. In 1983, the Commission amended the rule to be more

specific as to what must be included in a care instruction either for dry cleaning or for washing.

The Commission defined dry cleaning in 1983. Prior to that time, there was no definition for dry cleaning. That caused a number of problems. The rule currently defines dry cleaning in the following way:

"a commercial process by which soil is removed from products or specimens in a machine which uses any common organic solvent (for example, petroleum, perchloroethylene [perc], fluorocarbon)."

I guess that's already a little out of date because fluorocarbon is only available now to those who stockpiled it. The dry cleaning process may include moisture addition to solvent up to 75 percent relative humidity, hot tumble drying up to 160°F, and restoration by steam press or steam air finishing. The rule was also modified in 1983 to require a warning if any part of the normal dry cleaning process as defined in the rule would harm the product. For example, if a special instruction is given for professional dry cleaning, that means that dry cleaners should use the process above but modify it. One example given in the rule is if steam should not be used. The label should state "Professionally dry clean; no steam." Other warnings are "short cycle," "low heat," and "low moisture."

The other requirement that was added in 1983 is that a manufacturer must have a reasonable basis for the care instructions it puts on a garment. One example of a reasonable basis would be positive test results showing that the garment can be dry cleaned. However, there are other bases such as reliance on technical literature, past experience, and industry expertise. So, the rule currently requires one adequate method of cleaning with warnings against any part of the normal process that cannot be used and it requires that the manufacturer have a reasonable basis for that care instruction including any warnings.

I want to talk a little about what the rule does *not* do. It does not govern liability for consumer claims. The fact that a label recommends dry cleaning does not insulate the dry cleaner from liability. Liability with respect to consumer claims, depends on the laws of the states. And in many states, I've been told, the dry cleaner is basically held liable on a theory of bailment—he took the product, he's a professional, he's liable if something goes wrong. The rule does not insulate him against that liability. I want to make a point of that because the same is going to be true if we allow an instruction for professional wet cleaning. That will not insulate cleaners against liability. It's also true that the rule does not require the dry cleaner to do what's on the label. He is not breaking the law if he chooses to do something else. So, the rule is not going to solve all problems that might be encountered with professionally wet cleaning.

Let me go over what we would need to include professional wet cleaning in the rule. We would need the same elements that I just went through for dry cleaning. We would need a standardized definition of professional wet cleaning, similar to what we have for dry cleaning, so that warnings could be given if certain parts of the wet cleaning process would damage the garment. And we would also need a way of determining whether a manufacturer had a reasonable basis for placing a claim on the care label that the garment could be professionally wet cleaned. That's where the importance of the development of the test method comes in. Tests are not the only way of having a reasonable basis, but for a very new technique like this, they certainly would be more important than they are for more established techniques that have been around for decades.

The third important element is that wet cleaning would have to be available to most consumers. We need information about how available it is before we can allow garments to be labeled simply professionally wet clean. If there's no professional wet cleaner in an entire state, it's not really fair to the consumers in that state to put garments on the market labeled "only for professional wet cleaning." However, I gather wet cleaning is growing very quickly. Someone said yesterday that there are at least 80 in the North American Continent, but I hope there are more. Someone from Indiana said she thought there were 100 in Indiana alone. So hopefully, it's growing by leaps and bounds and the availability problem will be solved. But we need information on all those points; a standardized definition, what would be a reasonable basis for such a care label claim, and the availability of the service.

Let me tell you what's being done currently and what we've already done to start revising the rule, with

respect to professional wet cleaning and also with respect to home laundering. In June of 1994, we issued a Federal Register (FR) notice asking for comment on a variety of subjects about the rule. The comments we got generally expressed satisfaction with the rule. It's one of our most popular rules, so we're definitely going to keep it. We also noted that garments that are labeled "dry clean" may also be washable, but consumers and cleaners have no way of determining that from the label. We asked for comment on whether a garment that could be either washed or dry cleaned should be labeled for both washing and dry cleaning. We asked about the costs and benefits, including environmental benefits, of such an amendment. Now, in analyzing those comments, the Commission actually announced in a second FR notice in December 1995, that amendment of the rule might be necessary, and it issued what's called an advance notice of proposed rule making, asking for comment on more specific proposals.

Based on the comments we got to the 1994 FR notice, the Commission indicated it was not proposing dual disclosure; that is, that both washing and dry cleaning appear on the label of a garment which can be both washed and dry cleaned. Several commentators had noted that dual disclosure would require a dry cleaning label on all washable garments such as tee shirts, which generally are not dry cleaned. According to these commentators, this would require manufacturers who do not currently test for dry cleaning because they don't make anything that they label for dry cleaning, to begin testing for dry cleaning. That would be counterproductive as it would increase the use of perc. Other comments indicated that consumers would not want to spend money to dry clean garments that are washable. So for those reasons, the Commission indicated in the 1995 FR notice, that it was not proposing dual disclosure but, rather, proposing that for a garment that can be home laundered, it be so labeled. Dry cleaning instructions could also be added, if the manufacturer wanted to have both, but that would not be required. That's the current proposal that the Commission requested comment on in 1995.

In the 1995 FR notice, we also specifically sought comment on professional wet cleaning. We asked for a very specific description of the process. We got good comments providing that description, but I gather that's all still in a state of flux and we'll probably get more specific comments on our next round.

We also asked how many businesses provide this service. We're going to be asking that again on our next round, because this is a very important element that will go into whether we can change the rule to either

require or allow for profession wet cleaning instructions.

We also asked whether fiber identification should be on a permanent label. Some of the wet cleaning companies commented that they needed fiber identification and that it's not always available because it can be listed only on a label that can be cut off. We're exploring whether we should require that to be on a permanent label. Industry people have told me that most people in this country, at least, already put it on a permanent label. We are also proceeding on another front to allow all this information to be conveyed in symbols. Jo Ann Pullen will tell you what's available on that.

The next step in our rulemaking will be the publication of a more specific proposal and notice of proposed

rulemaking for comment. Then we will analyze those comments and determine whether we need to have hearings to complete the rulemaking process. That depends on how controversial all these things are and whether people want hearings. The 1983 amendments were quite controversial and hearings were held at several different cities around the country and the process took quite a long time. The rulemaking process can take a long time or it can be done quickly, depending on how controversial it is.

I want to finish by asking all of you to please comment when we do issue our next FR notice. Somebody yesterday said that most of the answers to all these problems are in the heads of the people here in this room. I certainly hope you'll comment and give us the benefit of that information.

FTC 16 CFR 423 **Glossary of Standard Terms**

Dryclean:

a process by which soil may be removed from products or specimens in a machine which uses any common organic solvent (for example, petroleum, perchlorethylene, fluorocarbon) located in any commercial establishment. The process may include moisture addition to solvent up to 75% relative humidity, hot tumble drying up to 160°F (71°C) and restoration by steam press or steam-air finishing.

Professionally dryclean:

use the drycleaning process but modified to ensure optimum results either by a drycleaning attendant or through the use of a drycleaning machine which permits such modifications or both. Such modifications or special warnings must be included in the care instruction.

**ASTM D5489 symbols report
drycleaning per FTC Trade Regulation
Rule 16 CFR 423 on Care Labeling**

General:

- "If a drycleaning instruction is included on the label, it must also state at least one type of solvent that may be used."
- "If all commercially available types of solvent can be used, the label need not mention any types of solvent."

Warnings:

- "If there is any part of the drycleaning procedure which consumers or drycleaners can reasonably be expected to use that would harm the product or others being cleaned with it, the label must contain a warning to this effect. The warning must use the words 'Do not,' 'No,' 'Only,' or some other clear wording."
- "If a product can be drycleaned in all solvents but steam should not be used, its label should state 'Professionally dryclean. No steam.'"

Status Report From ASTM's Care Labeling Committee

Jo Ann Pullen

American Society for Testing and Materials

Ms. Pullen is the K-12 Health Coordinator, Department Head, and Teacher of Family, Consumer, and Health Sciences at Pioneer Valley Regional School in Northfield, Massachusetts. She has been an active consumer member of the American Society for Testing and Materials Committee D13 on Textiles for 19 years. Ms. Pullen is a doctoral student in Occupational Education at the University of Massachusetts, holds an M.S. in Textiles and Clothing from Cornell University, and earned a B.S. in Family and Consumer Sciences Education from Pennsylvania State University.

First, I'm going to give you a little background about the American Society for Testing and Materials (ASTM). ASTM's Committee D13 on textiles is 82 years old, and I'm the first woman chairman of the Subcommittee of Care Labeling. We also have committees for writing various standards. The D13 committees include producers, users, government, academia, and consumers. We write consensus standards, which are approved by ballot. If the draft of a standard receives a negative vote, it has to be in writing, it has to be technical or editorial, and we have to resolve that negative in writing before we can proceed with revisions. We have been through many ballots. Committee D13 has over 325 standards in their handbook. We work together with the American Association of Textile Chemists and Colorists, which also writes standards, so that we're harmonized in that sense. Our standards are backed by research, member expertise, and confirmation testing, if it is something that needs a round robin trial to prove that it works.

Our goals are to promote knowledge of textiles and develop consensus standards for textiles and related material. We have four standards. We have one that is the care symbols. We have another that is evaluating care information, which is simply a guide that tells the manufacturer to set some criteria and then to test it and write their report. We also have a standard definition of terms for apparel, and we have one for pile floor coverings.

The care symbols system is based on a simple pattern: three dots is hot or high, two dots is warm or medium, and one dot is cool or cold, or low setting. So in the washing, there's high, medium, and low for temperatures. If it is the washing machine, the tumble

dryer, or the iron, three dots is always hot or high, two dots is warm or medium, and one dot is cool or cold.

On the cycles for the appliances, a plain symbol is the normal cycle, one underline or minus sign is permanent press (meaning reduce the action), and two minus signs mean delicate or gentle. We also have a symbol for hand wash. In the United States we specify temperature. In Canada, I think their standard is 30°C, and in Europe it's 40°C, so that is one point for harmonization. In addition, there is a symbol for machine wash warm, or the permanent press cycle.

Regarding bleaching, ASTM was working with the Federal Trade Commission rule. We took the glossary of terms and decided to work on a symbol for each term, to make us harmonize the best we can. We took all the International Organization for Standards (ISO) comments on that draft and standards that weren't met in the ISO standard, then we invited Canada and several other countries—Japan, Australia, and Mexico—to work with us. We had 15 countries in ASTM's D13 committee at the time we developed this. We have a symbol for only non-chlorine bleach (which is very commonly used in the United States), any "bleach," and "do not bleach." The reason for the solid "do not bleach" symbol is that the regular triangle with an "X" in it means "do not chlorine bleach." In the United States, you need to have an instruction, not a warning for bleach; you say "only non-chlorine bleach" when needed.

The drying symbols are the same as Canada's and Mexico's. The European or ISO system has no natural drying symbols, and they do not have a non-chlorine bleach symbol, so the European or ISO system partially meets U.S. needs. The ASTM system has symbols for

tumble dry, normal, permanent press, delicate, three temperatures, no heat, and do not tumble dry. For ironing, we have high, medium, low setting and an additional symbol to warn “no steam.”

Now we get into what you're interested in: dry cleaning. Currently, ASTM adopts the ISO terminology for solvents. For example, there is a symbol that stands for any solvent (which is used mainly for perchloroethylene [perc]). The beauty of the ASTM system is that as we are reaching out more and as people are becoming more interested, it simply takes a draft we all agree on, and then we revise the standard. We do not have to wait 5 years. If technology changes and a new, more environmentally friendly dry cleaning solvent is found, the entire industry and government agree on a symbol through ASTM, we ballot it, and it's added to the standard.

The reason that the single underline (used in Europe, meaning short cycle and/or reduce moisture, and/or low heat, and/or no steam finishing) was separated is because ASTM is not allowed to put out one symbol that means four things. In that situation, the person who is reading the symbol has to make the decision which of those four things it means. At ASTM, we're proud of the fact that our standards are technically clear. One underline that means four different instructions is not technically clear, so it goes against the way ASTM is allowed to do business. In the standard, you may use a symbol and then spell out what that means. If you want to say low heat or reduced moisture, you don't have to use that symbol. You may use symbols and words together. So it will work for a Canadian system where they have the dry clean circle and they use words. The difficulty in North America is you need words in three languages.

In speaking with Helmut Kruessman who is chairman of the GINETEX Technical Committee, he says that P is commonly used to indicate “professional dry cleaning.” I have also learned that GINETEX proposed a W for wet clean and Japan proposed a W for “white spirit” if F was not acceptable as a clear instruction. So you see we're ready to discuss this and figure out what works and revise the standard if we need to for dry cleaning. But we need some symbols to identify the solvent, perc and/or petroleum or petroleum only, and as wet cleaning becomes more common, we'll need a symbol for that as well. We had originally begun with a symbol with WC in it for professional wet cleaning to alert people that this is a different process than dry cleaning. Now Europe is considering redefining the circle as professional cleaning. Then we could use the WC or W, but come to an agreement on what the letters would be for wet clean, petroleum, and perc.

The good news is we're all here together working on this, and the better news is that when we decide it, we'll all do it together. It takes about 3 months to get through the balloting process. I am so glad that we're internationally discussing these situations and will come to agreement. As you can see, in two days my overheads are out of date, because I've talked to more people and it looks good.

When I go to a classroom, I use a chart that has a lot of lines on it and a chart with no lines breaking things up, and have children decode four symbols. Then I ask them to do some meta-cognition, thinking about the thinking. Which chart were you most comfortable with? The random thinker, or the creative thinker, likes the chart with no constrictions. The organized, sequential thinker likes the chart with the lines. So I thought I'd educate you about that, that when it comes to consumer education, you've got two different frames out

Committee D-13 on Textiles

- Promotes knowledge of textiles
- Develops consensus standards for textiles and related materials

DEVELOPS STANDARDS FOR:

Fibers

Yarns and Cords

Fabrics and Fabric Systems

Physical Testing

Flammability

Home Decorating Products

Apparel Products

Notions

Sizing

Care Labeling

Nonwovens

Inflatable Restraints

Committee D-13 on Textiles

Working together

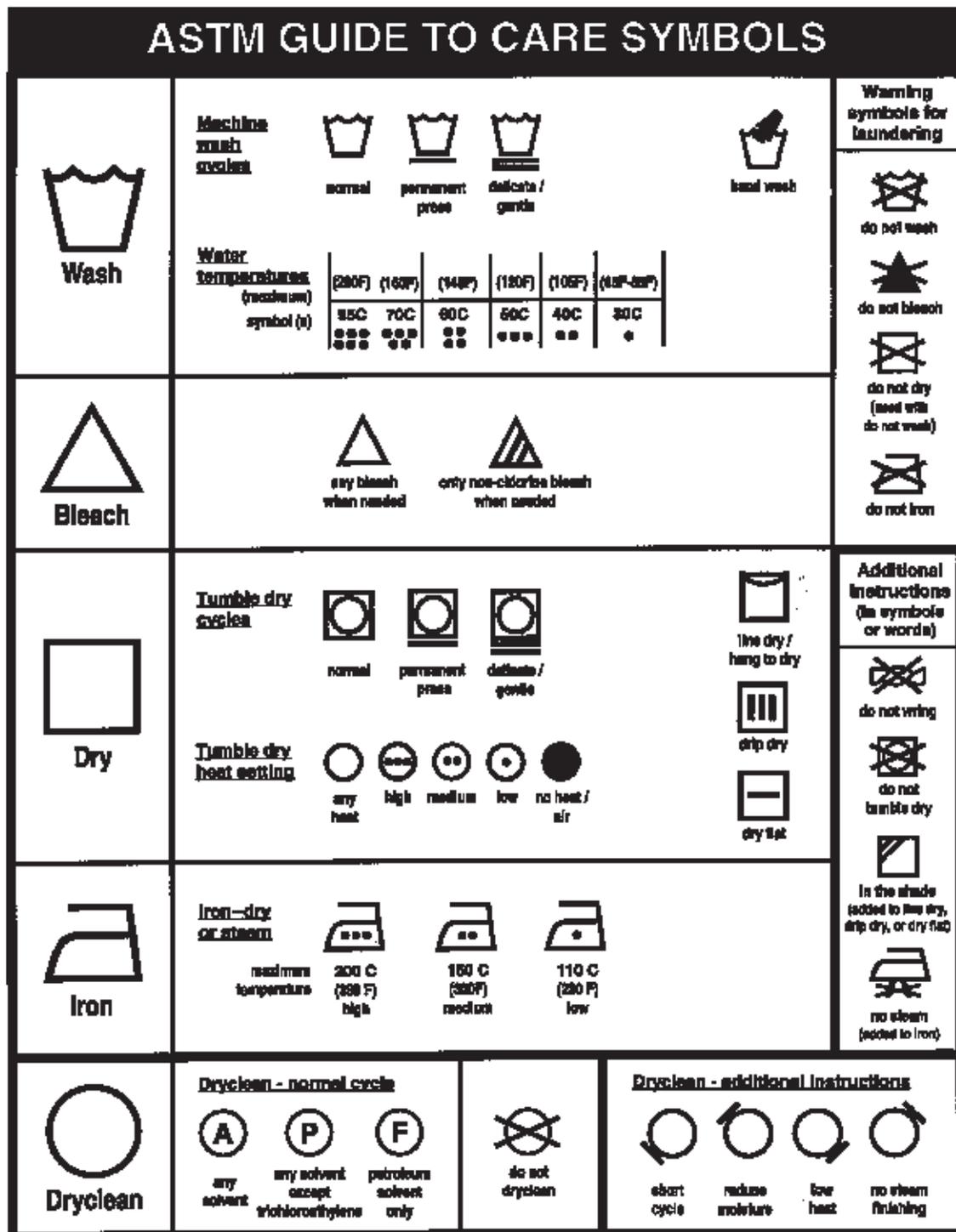
- **Producers**
- **Users**
- **General Interests**
- **Consumers**

Writing consensus standards

COMMITTEE D-13 ON TEXTILES

Over 325 Standards

**Standards development
backed by
research,
member expertise,
and
confirmation testing.**



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Note: This Figure illustrates the symbols used for laundering and drycleaning instructions. As a minimum, laundering instructions include, in order, four symbols: washing, bleaching, drying, and ironing; and, drycleaning instructions include one symbol. Additional symbols or words may be used to clarify the instructions.

ASTM D5489-96b FIG. 1 Commercial and Home Laundering and Drycleaning Symbols

ASTM D5489 GUIDE TO CARE SYMBOLS



Wash

CYCLE + H₂O TEMP = SYMBOL

 normal	50C ●●● (120F)	 machine wash, 40C (warm), permanent press
 permanent press	40C ●● (105F)	
 delicate / gentle	30C ● (65F-85F)	



**do not
wash**



**hand wash
40C (105F)**



**hand wash
30C (65-85F)**

ASTM D5489 GUIDE TO CARE SYMBOLS



Bleach



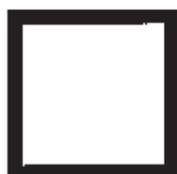
**any bleach
when needed**



**only non-chlorine
bleach when needed**



do not bleach



Dry



**line dry /
hang to dry**



drip dry



dry flat



**in the shade
(added to line dry,
drip dry, or dry flat)**

ASTM D5489 GUIDE TO CARE SYMBOLS



Dry



Tumble Dry

CYCLE + HEAT SETTING = SYMBOL

 normal	 high	 tumble dry, high
 permanent press	 medium	
 delicate / gentle	 low	 do not tumble dry
	 no heat	

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ASTM D5489 GUIDE TO CARE SYMBOLS



Iron

(dry or steam)



high
200C (390F)



medium
150C (300F)



low
110C (230F)



no steam
(added to iron)



medium iron
no steam

ASTM D5489 GUIDE TO CARE SYMBOLS



Dryclean



normal,
any solvent



normal, any sol-
vant except
trichloroethylene



normal,
petroleum
solvent only



do not
dryclean



short
cycle



reduce
moisture



low
heat



no steam
finishing

Care Labeling and the Textile Industry

Kay M. Villa

American Textile Manufacturers Institute

Ms. Villa is the Assistant Director of the American Textile Manufacturers Institute's (ATMI's) Product Services Division and serves as the staff secretary to the Consumer Affairs and Upholstery Fabrics Committees. She is responsible for coordinating ATMI's strategic standardization initiative under the Board of Director's Task Force on Global Competitiveness. Ms. Villa holds an M.S. in Textile Engineering and Science from North Carolina State University and degrees in Textiles and Interior Design from the University of Wisconsin.

I'm going to talk today about care labeling and how the textile industry interfaces with that. I'm going to reserve most of my comments to talk about the new care symbol systems. I want to talk about how the industry interfaces in terms of wet cleaning. I also want to thank the U.S. Environmental Protection Agency (EPA), Dr. Wentz, and Ohad Jehassi for inviting the American Textile Manufacturers Institute (ATMI) to be a co-sponsor for this program. We were first aware that EPA was looking at alternative dry cleaning techniques about 4 years ago. At that time, and since then, we have been contacted twice by EPA to find out what our industry's position is on this. Basically, however, we have not been involved in this process. We have a great deal at stake and in order for you to be successful, you must engage our industry in this process.

First of all, I want to talk about what ATMI is and what we represent. I also want to describe to you the fiber, textile, apparel, retail pipeline. It is a commerce stream, and it starts at one end with raw fibers—both natural fibers such as cottons and wools, and synthetic products such as nylons and polyesters. We convert them into fabrics which are handed over to an apparel manufacturer who cuts and sews the fabric into garments. The garment is then transferred downstream to the retailer who provides that product to the end consumer. ATMI represents one segment within this pipeline. We are involved in the actual manufacturing of textile products. This includes yarns, threads, fabrics, and in some cases, end products. We use techniques such as weaving, knitting, non-woven paper-type production, printing, dyeing, finishing, and tufting of these fibers into textiles or fabrics. We also have members that produce products such as bandages, carpets, comforters, sheets, linens, and literally thousands of different end products. But as an association, we do not represent apparel interests.

There's one other issue I'd like to address here, which is some of the terminology that has been floating around. I've often heard the discussion of garment care as being fabric care and textile care. From an industry perspective, we would prefer to use the terminology "garment and apparel care," because that's really what we're talking about. We're talking about a specific end product and addressing its cleaning techniques.

ATMI's member companies, consume approximately 80 percent of all fibers utilized in U.S. textile operations. The gross domestic product (GDP) of this fiber, textile, and apparel pipeline is \$60 billion. It is the second largest industry in the United States, following the auto industry at about \$67-69 billion. The fiber industry is about \$8 billion, textiles are \$25 billion, and apparel is \$28 billion. Textile sales in 1995 alone were \$69 billion. The GDP is an integration which takes out the value added in all of those steps. Over the past 10 years, our industry has been spending approximately \$2 billion annually to modernize our facilities. We're doing this for several reasons: to increase our productivity, increase our efficiency, and improve the quality of the products we're providing. We're also modernizing for a lot of environmental reasons: to reduce energy consumption, reduce water consumption, and to produce a more environmentally friendly product.

When we talk about consumer labeling, I want to make you aware of the fact that the industry actually complies with four different labeling regulations. At this point, we've only discussed one, which is Trade Regulation Rules on Care Labeling of Textile Products for General Wearing Apparel and Certain Piece Goods—I will just call it the Care Labeling Act. The other two regulations that are enforced by the Federal Trade Commission include the Textile Fiber Products Identification Act (TFPIA) and the Wool Products Labeling Act. The Wool Products Labeling Act goes all

the way back to the 1930's and is essentially a consumer protection regulation. So when you go out and buy your cashmere sweater, you in fact are getting cashmere, not mohair. The other regulation that the industry deals with is one on a state level. It's called The Uniform Packaging and Labeling Regulation, and it basically deals with the physical dimensions or characteristics of products. So when you go to the grocery store and you buy a can of tomato paste, and it says that it's 8 oz. or 12 oz., that in fact is a requirement under this rule. The enforcement under that rule occurs at the state level, so state metrology or state weights and measures offices are responsible for it. Our segment of the industry, in terms of producing carpets and home furnishings products, must include dimensions to describe to the consumer what they're buying.

The Care Labeling Act requires a number of different things. In fact, it requires different things of the textile industry than it does of the apparel industry. It is mandatory for apparel, but it is not required for home furnishings products. Our industry, since the promulgation of the rule in 1971, has provided care instructions to the consumer on a voluntary basis. The rule does not address industrial products. What happens in this pipeline stream is that we do not provide a permanent care label to each bolt of fabric that we sell to our customers. We typically provide that information on the invoice as the product is transferred downline.

TFPIA is really a very important regulation. It's applicable to apparel and home furnishings. There are mandatory requirements. Country of origin and manufacture identification is required to be permanently attached to the product at the point of sale. Fiber type, however, is provisional. Most industry people in the United States automatically provide this on a permanent care label, but it is a voluntary option. It is an important piece of information, however, because when the consumer goes to purchase an article of clothing, their decision is made based on previous experience with the product. So when I pick out a suit in a store and it says wool, I'm going to know based on the fiber type, what I can do with this product and what the expected life of it will be. Again, as we transfer the fabrics downstream to our customers, this information is generally provided on an invoice.

Now, I want to talk a little bit about ATMI in terms of how we relate to the environment. In 1992, we started a new program called Encouraging Environmental Excellence (E3). At this point in time, more than 50 percent of our members are involved in this program. What the program does is ask our members to go above and beyond local, EPA, and state environmental requirements. In our E3 1994 annual report, it talks about our 10 point program representing the minimum

criteria companies must meet in order to participate in the program.

I think the real selling point of the program is the fact that if a member goes through this process, they've essentially qualified for International Organization for Standards (ISO) 14001, the new environmental management system standard that will come out next year. I think it's a real feather in our cap that our members have done this. The only thing that would be required for our companies to meet ISO 14001 is for an outside third-party certifier to come in and audit the books. The E3 logo is essentially a marketing program for our members to show that they in fact are a company that is committed to environmental initiatives. Some of you may have seen this logo in the L.L. Bean catalog.

Now let's talk about ATMI's position on the Care Labeling Rule, with regards to the new wet and "eco-cleaning" techniques. ATMI does support the proposal to change the rulemaking to allow the optional use of symbols to provide consumers with care instructions. Additionally, we support the dual labeling requirement to provide dry cleaning and eco options (I'm going to use eco not just wet), meaning alternative technologies, to describe to the consumers that they have these options. Our support of that is based on the provision that the requirement would only be applicable to items that normally would be dry cleaned. If it were applicable to products that would normally only be laundered it would lead to increased testing for us, increase labeling costs, and could increase the consumption of perc and other solvents.

I think our E3 program demonstrates that ATMI does support eco initiatives. We do have some concerns about the potential of moving forward with these new technologies because these technologies have not been used with the pipeline of products that are out there. If the consumer has the idea that they can just take any of their clothing out of their closet and take it to a local Greener Cleaner, we would expect to see more damage claims. We would expect to see problems including shrinkage, color loss, dye transfer, color bleeding, felting of wools, stiffness in some fabrics, and water stains and water marks. I was very interested in the comments that were provided yesterday, both on the Greener Cleaner project in Chicago and in Germany, and I'm very pleased to hear that there are now up to 31,000 garments that have been tested with this new technology. We need more testing. The 31,000 samples that have been tested are minuscule compared to the 12 billion garments that are sold in the United States annually.

Yesterday, Dr. Josef Kurz told us about research being carried out in Germany. He indicated that approximately 200 million garments are cleaned annu-

ally. Please note that these 200 million garments only represent slightly over one and a half percent of the U.S. annual market. The German experience is a very good example, but it does not automatically correlate to the size and scope of the U.S. marketplace.

The industry will not be able to automatically modify our product, or reformulate to meet the rigors of these new cleaning technologies. That would include our spinning operations, how we take fiber and spin it to make it into yarn, how we take those yarns and then convert them into woven goods or knit goods. It would include how we scour, that is, how we clean the fabric before we prepare it for adding dyes and finishes. The technology that exists in the textile industry today is based on 300 years of product development. A lot of that product development has come over the last 50 years with the advent of a number of synthetic products and synthetic fibers. That doesn't mean that we won't change, but I'm not going to stand up here and say that our industry is automatically going to accept all of this and reformulate our products.

I also want to emphasize that, as we discussed yesterday, just because a product can be eco cleaned does not necessarily guarantee that the manufacturing

processes that went into the development of that end product were done in an environmentally friendly manner. So we have to be able to weigh these options. If it's more important on one end, what does it mean we give up on the other end?

I also want to stress the kind of time line that we're talking of in terms of taking fibers from one end of the pipeline and getting it down to the end consumer. Normally, most textile operations can take anywhere from 6 to 18 months to transfer the raw fiber to the end product that goes to the consumer. It will require a very large amount of time for the industry to make modifications. In some cases, it might be an easy fix; it might be something the company can do within a 2-month period of time to reformulate to develop a better product. But in some cases, we may never be able to find a solution that will take every single fiber, every single product and guarantee that it can be cleaned with these new technologies.

The other major factor that will really drive whether or not we are all successful is whether the consumer will accept the end product that comes out of the pipeline stream.

1

Care Labeling and the Textile Industry

Apparel Care and the Environment:
Alternative Technologies and Labeling

September 9-10, 1996

2

This is ATMI

- Manufacturing
- Techniques
- End Products

3

This is ATMI

- Membership represents 80% of fiber consumption
- GDP > \$60 B
- Modernization - \$2 B

4

Consumer Labeling Rules and Regulations

Textiles and Apparel Required To Meet Four Rules

- Care Labeling Act
- Textile Fiber Products Identification Act (TFPIA)
- Uniform Packaging and Labeling Regulation (NCWM)
- Wool Products Labeling Act

5

Care Labeling Act

Promulgated in 1971

- Labeling Requirements for Product Disclosure to the Consumer
 - *Apparel—Mandatory*
 - *Home Furnishings—Voluntary*
 - *Industrial—No Requirements*
 - *Upstream Manufacturers Supply Care Instructions Via Invoice*

6

TFPIA

Promulgated in 1950s

- Products
 - *Apparel and Home Furnishings*
- Product Information
 - *Fiber Type, Country of Origin, and Manufacturer's Identification*
- Manufacturer's Supply Information Via Invoice

7

ATMI and the Environment

*Encouraging Environmental Excellence Program
Promulgated in 1992*

- > 50% of ATMI Members Enrolled
- Company Programs Exceed EPA, State, and Local Requirements

8

ATMI and the Environment

*Encouraging Environmental Excellence Program
Promulgated in 1992*

- Environmental Management
10 Point Program
- E3 Members Meet ISO 14001

9

ATMI and Care Labeling

- Support Current FTC Rulemaking To Change Care Labeling Act

10

ATMI and Care Labeling

- Support Dual Labeling of Dryclean and Eco-Clean Systems
 - *Should Apply Only to Products Normally Drycleaned*

11

Implementation of Eco Cleaning Systems

- ATMI Supports Eco-Initiatives
- More Damages Seen if Customers Perceive that Methods Work for All Products

12

Implementation of Eco Cleaning Systems

Limitations

- Industry cannot Automatically “Turn Over” or Modify Products
 - *New Cleaning Methods Require New Formulations*

Implementation of Eco Cleaning Systems

Limitations

- Fiber, Textile, and Apparel Retail Pipelines
 - *6 to 18 Months*
- Phase-In Time Required by Industry
 - *Minimum of Several Years*

Care Labeling and the Apparel Industry

Carl Priestland

American Apparel Manufacturers Association

Mr. Priestland is chief economist for the American Apparel Manufacturers Association (AAMA). For over 2 decades, Mr. Priestland has represented AAMA and its members at international negotiations on bilateral and multilateral trade agreements. He is also active in the International Apparel Federation, for which he developed the current structure for reporting world-wide apparel production and trade. Mr. Priestland holds an M.A. in Economics from American University and a B.A. from Western Michigan University.

It's a pleasure for me to be here today. American Apparel Manufacturers Association (AAMA) members make about 70 percent of all the apparel produced in the United States, and they have plants in almost every state. So we contribute a great deal to the economic well-being of the United States.

Half of all the garments purchased in the United States are made here. The apparel industry has sales of \$50 billion, provides 860,000 jobs, and makes 6.5 billion garments that require care instructions. As you've already heard, the United States is about to adopt a care symbol system that will provide an alternative to written care instructions. To be acceptable to the Federal Trade Commission, this system must relay the same information to the consumer that is now given via written instructions. We've been working on this for some 4 years now; it isn't something new that has just come up in the last 6 months or so.

When we started, the change was brought about by the needs to harmonize the labeling requirements within the North American Free Trade Act (NAFTA). In the NAFTA text itself, it says that the members are committed to harmonizing the required labeling rules of the three countries, that's why we're here. Since the United States was the only country that did not have a care symbol system, it was up to us to change. In the case of Canada, it's voluntary, but in the case of Mexico, it is required if you don't use written care instructions.

The proposed care label system in NAFTA is also an American Society for Testing and Materials system, and it is fairly compatible with the International Organization for Standards (ISO) system. There are a number of points I think we should make here when we talk about this care symbol system and care labeling in general. U.S. industry has a vested interest in

providing consumers with the information they need to maintain garments. There is a desire to have this care symbol system, and it is something that we all feel is very important.

When consumers look at garments, they look at labels for two things: fiber content and care instructions. Whether or not they buy that garment depends on what they find. If the care instructions are too complicated, they may not buy it. If the fiber content is not right, even if there are good care instructions, they may not buy it. So, it's very important that we have a system that will provide the consumer with what they need and also have consumer satisfaction.

While the apparel industry has the primary responsibility for care labeling (because we put the labels on the garment during assembly) retailers at the other end—and the yarn and fabric producers—also have a vested interest in ensuring that the consumer receives proper care instructions. The use of incorrect care instructions for the materials used in the garment can cause damage, and damaged garments cause consumer dissatisfaction. That's the one thing we don't want. We want to make sure when we put something out to the consumer, it has the instructions necessary to maintain that garment properly for its useful life. All the materials in it have to be tested. We have to know what those materials will do as we go along, as the garment is being used and cared for.

Care labeling is not new; we've had a mandatory care labeling requirement for 25 years. The important thing here is that the United States is one of the very few countries that *requires* this. Most countries of the world that accept a care symbol system or written care instructions do not require it to be put on the garment permanently. There are very few countries that require it. So we're very concerned that we have the time frame

necessary to do what we decide to do. We believe that it's extremely important that any modification of care labeling rules be done with great care and with sufficient lead time to adjust to the changes. We've talked about this in the last 2 days in terms of wet processing and dry cleaning in general, which, as everybody pointed out yesterday, is only 10 percent of the total amount of garments being cared for. It is important that we put out care instructions that say the kinds of things we need the consumer to know. We need to know what's going to happen when the consumer throws a garment in the laundry or the professional cleaner takes it and puts it in their system, whatever that system is.

It's important also that we have a system that is useful not only in NAFTA, but also worldwide. Almost \$100 billion in garments are sold worldwide just to the developed countries; the European Community and the United States each import about \$38 billion worth of apparel a year, Japan imports another \$16 billion, and \$8 billion is imported by the rest of the developed countries. Ninety percent of these imports come from the emerging countries of the world. We have a huge amount of international trade. One of the things that we were cognizant of and wanted to make sure of when we develop the system is that this system be compatible with the ISO system to the extent possible. We want to have a single worldwide care label symbol system that will provide icons for consumers worldwide to understand how to care for their garments.

The only major concern we have between the NAFTA rules and the ISO is that we believe that any system developed worldwide should not be encumbered by any type of proprietary trademarks. We will

work with the ISO system and try to arrive at something because we believe sincerely that one worldwide system is important. I think we're going to be able to do that. It will take a little time, but I think it's possible.

In conclusion, the apparel industry is committed to working with its suppliers to make sure the materials we use in garments are compatible, and that how the consumers take care of those garments will provide them with a long useful life. The worst thing we can do is to make a garment that shrinks, or the colors run, or print falls, or whatever. The retailers are the first line to get hit with this problem, but we also run into it because we have the primary responsibility for what we use in garments.

We need time to adjust. We cannot adjust in a few weeks or a few months. It takes 6 to 9 months just to get new woven labels to put on garments and to utilize the inventory of current labeling. It is not an easy task. And that's just one area; we're talking about changing the way garments are dry cleaned and the way in which consumers perceive proper cleaning for their major garments. The worst thing I think we could have is to have an expensive wool suit, coat, or jacket shrink. Consumers would be up in arms immediately if that happened. Besides, we not only have to worry about shrinkage of the shell fabric, but there are five or six different fibers and fabrics in most tailored clothing, and that's the area where most of the dry cleaning and refurbishing on a professional basis takes place. Anything that we do to utilize wet cleaning in this whole process needs to be done very carefully, but it needs to be done and that's why we're here today.

One Retailer's Perspective on Care Labeling, Consumers, and the Environment

Jennifer Holderness

Gap, Inc.

Ms. Holderness is Manager of Product Standards and Environmental Assessment for Gap, Inc. She is responsible for developing product standards, including the environmental evaluation of products, as well as for assessing the environmental performance of the company's current and potential suppliers. Ms. Holderness holds an M.S. in Natural Resources Policy and Management from the University of Washington and a B.S. in Environmental Sciences from the University of Virginia.

I want to thank you all on behalf of the Gap for inviting us to participate today. This is a very exciting initiative. When I came to the Gap two and a half years ago, we sat down and started prioritizing our environmental impacts and some of the initiatives we wanted to tackle. We looked at these issues, not only in relation to manufacturing and our suppliers, but also our products. It was clear that one important issue was the care of the garment, based on the chemicals that were used. Based on all the work that's been done over the last few years, my comments are probably a summary of what's already been stated. Also, while I don't really have any legal obligation to provide you with a disclaimer, I do want to say that my comments are reflective of what we believe at the Gap, and they're not necessarily representative of our industry.

I want to give you a little bit of background on the Gap, especially for our European visitors who may not see the Gap in every mall, yet. We are a specialty retailer providing casual clothing for men, women, and children under five brand names, the Gap, GapKids, babyGap, the Banana Republic, and the Old Navy Clothing Company. We operate approximately 1,800 stores, and this number goes up almost daily, in the United States, Canada, United Kingdom, Germany, France, and Japan. Currently, we also employ somewhere in the neighborhood of 66,000 employees worldwide. It's a pretty extensive organization and because of this, the impact we have on the environment is not insignificant. It is obviously not something we can ignore. When I came to the Gap, we began looking at ways to influence not only the manufacturing of our products, but also other areas. We looked at construction, looked at our internal practices, and looked at any

areas where we could have an impact. I think that anyone in the company would agree that profitability and responsibility are not exclusive and in fact someone argued that these circles should overlap. I just wanted to make it clear that we do believe that these two will work in sync and are looking for ways to support this. Initiatives such as this conference really get to the heart of this issue. Not only are we talking about enhancing customer satisfaction but we're also talking about improving environmental performance on a very large scale.

In terms of customer satisfaction, we have found, through numerous focus groups both here and in Europe, that the care of the garment is something that's important to customers. It's something that they do look at, particularly for the shoppers of Banana Republic, which features higher end, more tailored clothing. As Jo Patton mentioned, I am serving on the University of California, Los Angeles Advisory Board on their wet cleaning demonstration project, to support their research. The retailer really is on the front line of garment care issues. It's our label, and it's our reputation that's at stake here. We need to make sure that these initiatives are going to work. Inclusive in that is looking at whether this process is going to perform well on all fabrics. We also want to make sure that when we go ahead with something like this that the environmental reductions are measurable. We're looking closely at the tradeoffs involved in wet cleaning and in the life-cycle of a garment from textile manufacture through to disposal. Also, we can't forget the financial impact both on the manufacturer and the customer. Obviously, we're going to need to put a lot of testing into this to make sure it's going to work. On the issue of care labeling, we want to make sure the

customer is not going to be confused. We find that we really only have about 10 seconds with the customer during their decision-making time, and we want to make sure that, in that time, we're giving them the information that they need in the way they can easily understand. That brings me to the next point, educating the customer and how we are going to do that.

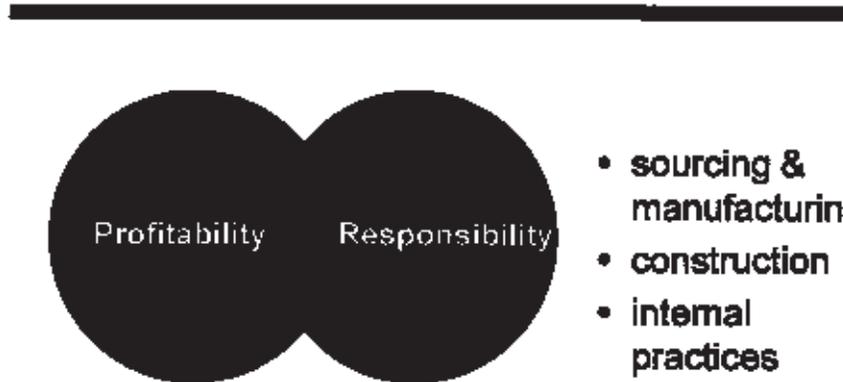
There are things the retailer can do, but other forms of education such as advertising may be needed. The success of this initiative really will be determined in the market place, and I think that we really have to make sure that the marketplace is ready when we have it together.

A Retailer's Perspective on Apparel Care and the Environment

Gap, Inc.

- **Specialty retailer - casual clothing**
- **Five brand names - Gap, GapKids,
babyGap,
Banana Republic &
Old Navy Clothing Co.**
- **1756 stores - U.S., Canada, U.K.,
Germany, France, Japan**

1



2

Apparel Care

- **Support initiatives to: enhance customer satisfaction and improve environmental performance**
- **Considerations**
 - does process perform well on all fabrications?
 - are the environmental reductions measurable?
 - what is the financial impact on both the manufacturer and the customer?
 - will the customer be confused by a new label?
 - how can we best educate the customer?

Care Labeling and the Fabric Care Industry

Mary Scalco

International Fabricare Institute

Ms. Scalco is Director of Government Relations at the International Fabricare Institute (IFI), the association of professional drycleaners and launderers. Ms. Scalco, formerly Supervisor of Textile Testing at IFI, monitors and responds to state and federal legislative issues and oversees IFI's care labeling program. Ms. Scalco previously worked in quality control for a drapery manufacturer and worked in research and development for a prominent carpet manufacturer.

The International Fabricare Institute (IFI) is a trade association for professional dry cleaners and launderers. IFI's membership is primarily comprised of dry cleaners—approximately 6,000—but we also have members from Better Business Bureaus, retailers, educators, allied trades, and apparel and textile manufacturers. IFI is affiliated, or works closely with local and state drycleaning associations as well as the Neighborhood Cleaners Association-International (NCA-I). NCA-I has approximately 4,000 dry cleaning members. It is estimated that there are between 30-35,000 dry cleaning plants in the United States. Since many of the members we represent have more than one operating plant, I am confident in saying that we represent the interests of the dry cleaning industry.

Professional cleaners depend on care labels. Their ability to provide to consumers a quality, serviceable garment depends on the care label providing accurate, and complete information. Cleaners are professionals. They have a working knowledge of fabrics. There's no way, however, that they can test each and every component which goes into manufacturing a garment to see how it will respond to cleaning. The dyes, fabric finishes, trims, interfacings, interlinings, and linings are often not visually or readily identifiable as presenting problems during cleaning. As Carl Priestland indicated, in most tailored garments, there are five to six fibers and fabrics that go into the inner workings of a garment. Think of your local dry cleaner, of who that business person is. He's usually not a textile graduate. About one-third of our industry is now Korean owners. They have an additional barrier with the language problem. So, yes, dry cleaners are professionals. No, dry cleaners cannot be expected to figure out how every single gar-

ment can be processed. That is why the Federal Trade Commission (FTC) requires the garment manufacturer to determine the appropriate method of care. The manufacturer has the resources available to evaluate each and every component that goes into the make-up of a garment. This is especially true as new processes are being looked at and developed for the cleaning of textiles.

Unfortunately, what the fabricare industry experiences is that the method of care specified is not always appropriate for the garment. All too often the following scenario occurs:

A customer's garment is damaged in cleaning even though the dry cleaner followed the care instructions. Because the care instructions were followed the cleaner informs the customer that they should return the garment to the retailer because the manufacturer did not provide adequate or proper instructions. The retailer tells the customer, "If the dry cleaner were a professional and handled the garment properly it would not have been damaged." The customer then returns to the dry cleaner unsatisfied and, to say the least, unhappy. The dry cleaner pays the customer, not because he felt he was responsible, but to retain the business. Still, the customer often loses faith in the dry cleaner's ability to do a good job.

The average dry cleaner has an average yearly revenue of \$200,000 with a profit margin of 2-3 percent. The above referenced scenario cannot happen too many times before that profit is seriously depleted.

Garment Damage

As I stated, the fabricare industry does find that garments are damaged all too often even when the care instructions are followed. Both IFI and NCA-I each house an analysis laboratory which attempts to ascertain how damage to a garment occurred and if that damage could have been prevented. Consistently, over the years, the highest percentage of garments received in IFI's laboratory have been damaged as the result of inaccurate or incomplete care labeling. Statistics from NCA-I's analysis laboratory support IFI's experience.

IFI developed a database which is regularly shared with the FTC. The database contains garment manufacturer name, RN Number, fiber content, country of origin, garment description, and damage type. In the past IFI has shared information in the database not only with the FTC but with apparel and textile manufacturers. NCA-I has made available to the FTC photos of damaged garments and corresponding care labels as well as the analysis laboratory report.

As an educational tool for the dry cleaner to use with consumers, IFI and NCA-I produce bulletins which give details on garments which have been damaged during cleaning. These are garments which the laboratory has received a number of times. IFI's bulletin "Not In Vogue" provides photos as well as a description of the garment. In addition it gives the results of IFI's contact with the manufacturer. In most cases IFI has found that the manufacturer is more than willing to work with the consumer either in the form of a refund or replacement.

Fabricare Industry's Involvement in Care Labeling

Because the fabricare industry is so dependent on care labels providing accurate information, IFI has made sure that it has played a role in the development of the FTC's Care Labeling Rule. Industry members have provided not only written comments but oral testimony, both prior to the adoption of the Care Labeling Rule in 1972 and in the years leading up to the FTC's

revision in 1984. Members of the fabricare industry are active members of the textile organizations influencing care labeling both in the United States (American Association for Textile Chemists and Colorists and American Society for Testing and Materials) and internationally (International Organization for Standards).

The fabricare industry has long held the position that alternative labeling should be required. That the care label should provide all appropriate methods, not just one which may not even be the best care method for the garment. Providing all methods of care gives not only the consumer, but the professional cleaner the option of choosing how that garment should be handled. The availability and breadth of options becomes especially important when discussing alternatives to dry cleaning, specifically wet cleaning. Unless an alternative is a 100 percent replacement, the fabricare industry would have trouble. It couldn't financially accept the liability of cleaning a garment unless the procedure is recommended on the care label.

Another position the fabricare industry strongly believes in and continually works for is that the reliable evidence requirements of the Care Labeling Rule be strengthened. Currently the Rule states that "the manufacturer must establish a reasonable basis for the care information." "Reasonable basis" includes: tests, current technical literature, past experience, and industry experience. The information can be subjective as well as objective; testing is not required. That results in a number of garments being damaged after cleaning. This is a disservice not only to consumers, but also to the fabricare industry. Professional cleaners are experiencing financial losses, not only because of reimbursement to the customer for a garment, but also more seriously because of the loss of consumers' trust and future business.

Manufacturers need to be held accountable and responsible for the care information they provide. The FTC needs to do a better job of enforcing the requirements of the Care Labeling Rule. Since its inception, the FTC has only prosecuted a handful of companies for violation of the Care Labeling Rule while thousands of consumers have had the unfortunate experience of having a garment damaged after cleaning.

Care Labeling and the Fabric Care Industry

Mary Scalco

International Fabricare Institute

Industry's Position on Care Labeling

- Support Alternative Labeling
- Strengthen “Reasonable Basis” Requirements

1

Fabric Care Industry's Involvement

- Oral Testimony
- Written Testimony
- FTC Access to Database
- Active Member of AATCC, ASTM, and ISO
- Participate in DfE Program

2

IFI Damage Analysis Statistics

Year	Total Garments Received	Approx. % of Damage Attributed to Inaccurate Care Labeling
1988	43,658	45%
1989	44,293	41%
1990	46,906	38%
1991	46,760	41%
1992	44,080	41%
1993	36,294	33%
1994	30,349	35%
1995	25,160	41%

Care Labeling and Consumers

Nancy L. Cassill

University of North Carolina at Greensboro

Dr. Cassill is Associate Professor of Textile Products Marketing in the Department of Clothing and Textiles at the University of North Carolina at Greensboro (UNCG). At UNCG, Dr. Cassill teaches courses in merchandising, retailing, textile products marketing, textile products consumer behavior, and international sourcing. She serves as President-elect for the International Textile and Apparel Association and is a member of the International Fabricare Institute Technical Advisory Board. Dr. Cassill holds degrees from Purdue University, Indiana University, and the University of Tennessee-Knoxville.

Today's consumer wants apparel that is easy to care for, comfortable, and priced affordably to fit their budget and lifestyle. These apparel preferences have challenges for fiber producers, fabric mills, apparel manufacturers, retailers, and fabric care specialists.

Today's Consumer— Educated and Demanding

Today's consumer is educated and demanding. The consumer has two thoughts: "save me energy" and "save me stress." Save me energy translates into the following apparel preferences:

- Make it simple to buy apparel
- Make it simple to care for apparel
- Make it simple to understand and to wear apparel

Save me stress means:

- Reduce problems
- Guarantee fair prices
- Offer a simple return policy

Today's consumer also has attitudes about "casual workplace apparel" and new apparel products. The casual workplace (also known as dressing down) has been in the U.S. corporate environment since 1979. In the past 3 years, there has been an increase in wearing casual wear to work. This increase has been evident by: the growing number of companies that have insti-

tuted casual day, and the increased number of casual days for companies.

In 1996, casual apparel for the workplace translates as "casual and comfortable" apparel. Recent research examining the casual workplace with U.S. Fortune 500 companies has found that the casual workplace has not peaked. There has been a rapid acceleration of Fortune 500 companies adopting this practice within the last 2 years (1994-96) and the number of companies instituting the casual workplace continues to increase. Casual apparel has become part of the corporate culture. Research has found that casual apparel improves workplace morale and is a no cost benefit to companies. No wonder over two-thirds of all U.S. companies have established some form of casual dress for the workplace.

New apparel products are the life of the textile and apparel industry. Today's consumer is searching for new, exciting and different apparel products. However, one remembers the distressing apparel retail environment in 1995 and 1996, when consumers opted to purchase hard goods, such as computers, instead of soft goods, such as apparel products. Lack of product innovation, purchasing computers instead of apparel, and consumers viewing apparel product sameness, has caused consumers to push the limits on life expectancy of apparel (a real challenge for fabric care specialists).

Consumer attitudes about shopping are interesting. In 1996, traditional shopping is less leisure driven and more of a chore. The retail marketplace presents pricing games. Time and energy constraints, lack of convenience (consumer may be less brand and less store loyal), and less interest in shopping are three reasons why some consumers are shopping less than 1 hour a week.

Consumer Attitudes About Care Labels

Many educated consumers are label conscious. For these consumers, care is an important criterion. Care labels become increasingly important with the in-store wrinkle resistant merchandising that emerged in the early 1990's. In addition, consumers still look at brand labels, fiber content, and now closely examine country of origin labels since child labor issues have come to light.

However, consumers are not educated about the difference between dry cleaning and laundry services. Specifically, consumers are not educated about the difference between wet cleaning and home laundry. Consumers distrust low labeling; "Dry Clean Only" may mean other (successful) methods. Many consumers do not read care labels while others do not take care labels seriously. Manufacturers and retailers are making guarantees about the finished apparel product and consumers have guarantee expectations (not always consistent with manufacturer and retailer expectations).

Distrust with labeling is but one part of a larger issue—honesty with all packaging is an issue. In addition to distrust (with care requirements, country of origin, and fiber content), some labeling information is not understood by the consumer. For example, the U.S. consumer still does not understand "microfiber" and "denier," even though these products have been in the U.S. marketplace for several years.

Consumer Perspectives: Wet Cleaning and Dry Cleaning

If the consumer interpretation of "Apparel that is easy to care for, comfortable, priced affordably to fit budget and lifestyle" is not enough of a challenge, the fabric care industry has wet cleaning and dry cleaning challenges.

Wet Cleaning Perspectives

Research conducted at the University of North Carolina at Greensboro has found interesting results related to wet cleaning perspectives. Consumers do not differentiate products that should be wet cleaned versus home laundered. In addition, the consumer has not been educated that the fabric care specialist wet cleans. Opportunities exist for consumers to utilize wet cleaning services since many consumers: (1) want professional appearance (including casual wear apparel), (2) are concerned with the environment (but may

not practice environmental actions), and (3) realize the cost (in time and appearance) of home laundry. For fabric care specialists, wet cleaning services may be targeted to consumers by exploiting these opportunities.

It is important to know that consumers can use (but are not using) high temperatures in home laundering of many apparel products. Results of using lower temperatures (such as soil retention, unsuccessful stain removal, and product appearance in jeopardy) result in dissatisfaction with the apparel product.

Dry Cleaning Perspectives

Research results also indicated that most consumers think all products are dry cleaned by the fabric care specialist. In addition, consumers question environmental issues, view the dry cleaning process as costly, attempt to launder "Dry Clean Only" items, and use the dry cleaner to correct stain and appearance problems.

Challenges and Opportunities

Get/Remain Involved in the Integrated Partnerships: Correct Care Label Myths with Industry and Consumer

This conference is a proactive step in addressing consumer challenges—and identifying opportunities for the fiber, textile, apparel, retail, and fabric care industries. The entire product chain (which includes the fabric care industry) is concerned with consumer apparel product satisfaction. Continual information exchange, and problem solving should occur with the following groups:

- Fabric care specialists
- Fiber producers
- Chemists and colorists
- Testing - Standards
- Textile mills
- Manufacturers (apparel, home furnishings)
- Converters
- Retailers
- Importers/Exporters

- Government

Topics of primary importance should include:

- Care labeling.
- Product/service trends.
- Fabric care industry's expertise and service at the product development stage.

This conference should be a starting point for future industry-wide task force(s) with quality assurance personnel. Panels and/or seminars at industry-wide conferences in addition to committees (such as American Association of Textile Chemists and Colorists committees) are excellent problem identification and problem solving forums. Product/service planning and purchases directly impact **everyone's** bottom line.

Talk To Your Consumers

Communicating with consumers is imperative in today's competitive environment. Fabric care specialists must get consumers to plants for wet cleaning *and* dry cleaning. Verbal and written communication should include the following 4 C's:

- Communicate why wet cleaning is better for casual apparel than home laundry
- Clarify at home laundry v. wet cleaning
- Control: Quality assurance of appearance
- Convenience

Consumers are aggressive and demanding when dissatisfied. Listen to consumers—they will appreciate your listening. Consumers offer good ideas and solutions, especially in test marketing new ideas. This communication will help reaffirm your marketing strategies. Benefits can include: store, brand, fiber, country loyalty, and a cost effective strategy to maintain your customer base.

Re-Evaluate Your Technology Approach

Technology is changing rapidly and it is imperative to re-evaluate your technology approach. An updated customer data base provides opportunities with product and service sales history, consumer products preferences, and data sharing with other product channel members.

Use Consumer and Product Information Provided

One final challenge: provide not simply knowledge, but education. This will illustrate your understanding of consumers' apparel needs and your interest in keeping the consumer satisfied with apparel products and services.

1

APPAREL CARE AND THE ENVIRONMENT

ALTERNATIVE TECHNOLOGIES AND LABELING

Nancy L. Cassill

Department of Clothing and Textiles

University of North Carolina at Greensboro

2

CARE LABELING AND CONSUMERS

**"Apparel that is easy to care for,
comfortable, priced affordably
to fit budget and lifestyle"**

3

- Today's Consumer — Educated and Demanding
- Consumer Attitudes about Care Labels
- Consumer Perspectives: Wet Cleaning and Dry Cleaning
- Challenges and Opportunities

4

I. TODAY'S CONSUMER — EDUCATED AND DEMANDING

A) Who are today's consumers?

1) Consumers Have Two Thoughts:

“Save Me Energy”

- Make it simple to buy apparel
- Make it simple to care for apparel
- Make it simple to understand and to wear apparel

5

“Save Me Stress”

- Reduce problems
- Guarantee fair prices
- Offer a simple return policy

(Adapted from Yankelovich Partners)

6

Consumer Attitudes about Apparel:

Casual Workplace ("Dressing Down")

CASUAL WEAR on increase ... for now

- Casual dress at work
- 1995: "The Stuff That's Important to Me"

CASUAL AND COMFORTABLE

(Yankelovich Monitor)

7

Casual Workplace ("Dressing Down")

- Fashion Cycle: Where is casual workplace?
 - Casual workplace has not peaked
 - Rapid acceleration of U.S. Fortune 500 companies adopting within last two years (1994-96)
 - Has become part of "corporate culture"
 - Improves workplace morale
 - No cost benefit to companies
- 2/3 U.S. Companies have established some form of casual dress

8

"New" Apparel

- Consumer is searching for new, exciting and different apparel products
- Pushing "limits" on life expectancy of apparel

9

Attitudes about Shopping:

Traditional shopping is less leisure driven/more of a chore

- Pricing games
- Time/energy constraints (less time)
- Convenience issues (may be less loyalty)
- Absence of fun/experience (less interest)
- Overall "pain" to consumer (shopping less than 1hr/wk)

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II. CONSUMER ATTITUDES ABOUT CARE LABELS

- ***Educated*** consumers who are "label conscious"
 - Care is important criterion
 - Care labels (especially with in-store "wrinkle resistant" merchandising)
 - Brand labels
 - Country of origin labels
 - Fiber content

11

- ***Not*** educated about the difference between dry cleaning and laundry services
- ***Not*** educated about the difference between wet cleaning and home laundry

12

- Distrust with "low labeling"
 - Many consumers do not read care
 - Consumers do not take care labels seriously
 - "Dry clean only" may mean other (successful) methods
 - Manufacturers/retailers making "guarantees" about finished product

13

● Distrust with labeling

- Honesty with all packaging is an issue
- Care requirements, country of origin, fiber content
- Some labeling information not understood (microfiber, denier)

14

III. CONSUMER PERSPECTIVES: WET CLEANING AND DRY CLEANING

"Apparel that is easy to care for, comfortable, priced affordably to fit budget and lifestyle"

15

Wet Cleaning Perspectives

- Can use (but not using) high temperatures, resulting in:
 - Soil retention
 - Unsuccessful stain removal
 - Appearance in jeopardy
 - Dissatisfaction with product and service
- Want professional appearance with "casual wear" apparel
- Concerned with environment (may not practice)

16

- Has not been educated that fabric care specialist "wet cleans"
- Does not differentiate products that should be wet cleaned vs. home laundry
- Wet cleaning not at cost of dry cleaning
 - At cost (time, appearance) of home laundry

17

Dry Cleaning Perspectives

- Think all products are dry cleaned
- Questions environmental issues
- Views process as costly
- Attempts to wet clean "Dry clean only" items
- Uses dry cleaner to correct problems (stain, appearance)

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IV. CHALLENGES AND OPPORTUNITIES

*Get/Remain Involved in the Integrated Partnerships:
Correct Care Label Myths with Industry and Consumer*

- With**
- Fabric care specialists
 - Fiber producers
 - Chemists and colorist
 - Testing - Standards
 - Manufacturers
(apparel, home furnishings)
 - Converters
 - Retailers
 - Importers/Exporters
 - Government

19

About

- Care labeling
- Product/service trends
- Fabric care industry's expertise and service

20

How

- Task force(s) with Quality Assurance personnel
- Panels, seminars at conferences
- Industry-wide conferences/committees

Why

- Their product/service planning ***and*** purchases directly impact ***your*** bottom line.

21

Talk To Your Consumers

Must get consumers to dry cleaning plant for wet cleaning and dry cleaning

- **Communicate** why wet cleaning is "better" for casual apparel
- **Clarify** "at home" laundry vs. wet cleaning
- **Control:** Quality assurance of appearance
- **Convenience**

22

Consumers are aggressive and demanding when dissatisfied

Listen to consumers

- They will appreciate your "listening"
- Consumers offer good ideas and solutions
- Test market new ideas
- Reaffirm your strategies
- Benefit—store, brand, fiber, country loyalty
- Benefit—cost effective strategy to maintain customer base

23

Re-Evaluate Your "Technology" Approach

- Opportunities with product/service sales history, preferences
- Data "power" with retailers and manufacturers

Use Consumer and Product Information Provided

- Provide not simply knowledge, but education



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Summary of Discussion

Session III



Jo Patton of the Center for Neighborhood Technologies (CNT) opened the discussion by thanking the speakers. She said that the conference had been informative and provided an opportunity to hear from apparel and textile manufacturers, communicate new developments, and decide where to go from here. She said the conference had made her optimistic about the future. She then opened the floor to comments and questions about what the next steps might be.

Bill Seitz of the Neighborhood Cleaners Association-International (NCAI) stated he had waited 45 years for the kind of dialogue that took place at the conference, and he couldn't be more pleased with the results. He stated that, in the final analysis, all the participants really serve the same master—the consumer. As a result, everything and anything that gets done jointly will benefit everybody.

Mr. Seitz stated that many people in the dry cleaning industry have looked upon the industry as a kind of necessary evil, but it is an extremely important part of the process. Talking about the textile industry in general terms is really a mistake, because the textile industry, just like the dry cleaning industry, has broad ranges of expertise and problems.

Mr. Seitz stated that NCAI's 1996 report on 1995 garment analysis (a copy of which is available) addresses these issues. It not only talks about the types of problems but the types of companies who are creating the problems. Sears, JC Penney, K Mart, and the Gap do not appear in the garment analysis reports, because they never have problems. Some of the companies in the report, however, are among the "who's who" of fashion: Ann Klein, Burberry, Calvin Klein, DKM, Ellen Tracy, Giorgio Armani, Jones New York, Liz Claiborne, Nordica, Tommy Hilfiger, and so forth. These companies use labels that say "dry clean only." The NCAI report makes the point that consumers blame the manufacturer or the retailer for damages, but only *after* they place blame on the dry cleaner. Dry cleaners end up paying for many garments that they shouldn't because they want to keep the customers' goodwill. Mr. Seitz said that it's not just a question of paying for the garment. The lost customer in many cases is more expensive than the garment, and that's a decision the dry cleaner makes that he would estimate is in the area of hundreds of thousands of dollars a year. He said that dry cleaners need a better and closer working relationship with the textile industry.

Mr. Seitz expressed concern about remarks made about the Federal Trade Commission's (FTC's) future responsibility. He stated that regulations don't mean much unless there is enforcement. He reiterated that there have only been six or seven cases brought against manufacturers in 25 odd years of enforcement, yet thousands and thousands of garments fail every year. He said he would like to see the enforcement gap close up a little bit so dry cleaners are not faced with the responsibility for failed garments. There are



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Summary of Discussion

Session III (Continued)

many garments that are improperly labeled, many are not labeled at all, and many are imported and have misleading labels. He stated that the notion that dry cleaners encourage low labeling in order to get more business is not true. Low labeling happens because the manufacturer often perceives that the dry cleaner will clean the garment better than the consumer. Given the changing world for the textile industry, dry cleaners, and the consumer, working together will be the solution to solving the problem.

Connie Vecellio of the Federal Trade Commission (FTC) stated that the FTC does enforce the care labeling rule and estimated that in the last 4 years they brought six cases. Prior to that FTC only brought one case because FTC spent quite a few years promulgating and amending the rule, a process that was quite lengthy and took up a lot of resources. FTC is now committed to enforcing the rule and is doing so. Ms. Vecellio requested the information referenced by Mr. Seitz.

Jack Weinberg of Greenpeace began his comments by thanking those responsible for making the meeting possible and expressing his belief that the meeting had been very productive. He explained that he had learned a lot about the labeling issue and was pleased that many people were discussing environmental concerns. He reminded people that as a representative of Greenpeace, he was most concerned with the environmental impact, but respected other people's interests.

Mr. Weinberg referred to the discussions concerning consumer education and suggested that if people could identify areas where the various interests can agree on consumer education, Greenpeace can be helpful in getting the message out. He believes Greenpeace can be very helpful in consumer education on the environmental issues where environmentalists can in good conscious have the same opinion.

Mr. Weinberg expressed some concern about care labeling. He wants to ensure that wet clean labeling actually achieves its intended objective. His concern is whether a wet cleaning label will be part of a transformation of moving more garments from dry cleaning to wet cleaning or whether a wet cleaning label will become a mechanism for fabricating a market and reinforcing that some garments need to be dry cleaned and some garments need to be wet cleaned. Mr. Weinberg expressed his belief that some substantial portion of clothing marked dry clean only can be very successfully wet cleaned.

Mr. Weinberg said that waiting to put wet clean labels on clothing until enough professional cleaners have the capability is a "chicken and the egg" problem. Cleaners will not do it until manufacturers require it. If only one label is required and it is either a dry clean label or a wet clean label, this will lead to additional problems while the professional garment care industry works to improve their techniques. He recommended a label that essentially says "professionally clean this garment." He suggested that this will allow wet cleaning technologies to be phased in as they become available.

Ken Adamson from Langley Parisian Limited in Ontario, Canada, provided some additional information on the Canadian wet cleaning project. He



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Summary of Discussion

Session III (Continued)

decided to use care labeling as a guide, but leave it to the operators to decide which cleaning method to use. He believes that the worst thing we could do is to end up with a wet cleaning ghetto and a dry cleaning ghetto. He thinks that the fabric care specialist has to balance the two cleaning processes to optimize their operation based on environmental concerns and the garments that he or she is handling.

Jo Ann Pullen of the American Society for Testing and Materials (ASTM) expressed her pleasure with the openness of the meeting. She explained that ASTM standard is a very easy standard to revise and improve, as long as technical information is available on which to base the revisions. She expressed some concern with Mr. Weinberg's proposal for a single label, unless that label has very specific information.

Ms. Pullen encouraged everyone to work with Europe and Europe to work with the United States through the American Association of Textile Chemists and Colorists (AATCC) to gather the information needed for specific conditions. Certain categories of textiles with trims may need a specific condition. She explained that there are different detergents for different fibers or variations in how to do things. Ms. Pullen encouraged the group to develop a label that has technical information that meets the needs of industry and wet cleaners.

Manfred Wentz of FLARE/AATCC thanked Ms. Pullen and explained that, as discussed the previous day, they have already established a close working relationship with the European developments as well as a collaborate effort to do international round robin testing to assess individual parameters necessary for identification. He mentioned that they have already received a proposal from the European Standard Organization on wet cleaning that will be scrutinized and adapted to the needs of the U.S. market. He repeated from the previous day's discussion that Dr. Charles Riggs already had one of his students visiting Hohenstein to get familiar with European wet cleaning testing protocol. The challenge, he suggested, is getting the appropriate information necessary to the apparel and textile industry so that they feel comfortable in identifying the proper care methods.

Ms. Pullen mentioned that in the ASTM system you can put both dry clean and wet clean on the label and report both processes.

Kay Villa of the American Textile Manufacturers Institute (ATMI) asked Mr. Weinberg to clarify Greenpeace's goals.

Mr. Weinberg explained that Greenpeace originally became involved in the issue because they are involved in a worldwide campaign to faze out production and use of certain substances, including perchloroethylene (perc). That is the primary goal, although Greenpeace has other goals. He stated that one of the intermediate goals is promoting wet cleaning. Another Greenpeace goal is to help cleaners make the transition to alternative methods. Greenpeace, according to Mr. Weinberg, is working with the entire fabric care industry, including manufacturers, to change care practices and whatever else has to be changed to move to a time when perchloroethylene



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Summary of Discussion

Session III (Continued)

and presumably many other organic solvents are no longer a part of clothes cleaning.

Mr. Seitz explained that the Neighborhood Cleaners Association (NCA) is involved in wet cleaning for a number of reasons, including environmental reasons. He explained that they are not convinced that perc is going to be eliminated, but are working towards reduction, an important part of the process. He suggested that the fact perc consumption had decreased a third over the last 10 years speaks well for the industry.

Mr. Seitz explained that the reason for the move toward wet cleaning is not just environmental, but also to satisfy the customer. He repeated a dry cleaning slogan, "dressing casual doesn't mean you have to look like a casualty." He reminded the audience that the dry cleaning industry has been wet cleaning for over 60 years. The big breakthrough is not equipment as much as it is chemistry and technology. There are better detergents, better solvents, better fabric softeners, better fabric finishers, and changing textiles (such as the move towards polyester, which lends itself better to wet cleaning). He suggested that it is up to the NCA to educate their members who in turn will educate the consumer. The NCA, according to Mr. Seitz, is not advocating the use of perc, but at the moment there is nothing better to replace it with. Unless and until that time comes, cleaners will continue to use it with all of the environmental constraints, controls, and requirements.

Margit Machacek from JC Penny's quality assurance center near Dallas noted that at JCPenney they check garments for quality, performance, and the accuracy of the label. The experience problems with low labeling. She suggested that suppliers be encouraged to provide accurate labels. It is not sufficient to educate the consumer without also educating the suppliers. She asked Ms. Vecellio what the current status of care symbols at FTC is. Many suppliers have been saying they can use care symbols without accompanying words as long as they attach information. Is this the case?

Ms. Vecellio replied that currently the FTC requires labels to have words.

Ms. Machacek asked for clarification and Ms. Vecellio explained that it is permissible to have symbols in addition to the words, but words are required. That is the law. Ms. Vecellio explained that the FTC has indicated it will eventually allow the use of symbols without words, which may be confusing Ms. Machacek's suppliers. Ms. Vecellio expects a final FTC decision to be published in the Federal Register this year, but based on the public comments, there probably will be some delay before garments can be sold in stores with only symbols because time is needed for a public education campaign.

Ms. Machacek asked if it was acceptable to the FTC to have a label containing symbols if it was accompanied by something explaining the meaning of the symbols.

Ms. Vecellio replied that it was not acceptable at this time. The permanent care label must have words, but FTC proposed that for some first period, maybe the first year, maybe the first eighteen months that symbols are



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Summary of Discussion

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allowed without words, there should be some additional material like a hang tag explaining these symbols.

Ms. Vecellio also elaborated on Ms. Machacek's earlier comments about low labeling. Under the current law, a garment can be labeled either "dry clean *only*" or indicate that it can be washed. She explained that a garment cannot be labeled "dry clean *only*" if it can be washed because that is an untrue statement and is a violation of the rule. The FTC asked for information on that type of labeling in a Federal Register (FR) notice and some people indicated that the low labeling practice exists. If so, according to Ms. Vecellio, it is a violation of the rule.

Ms. Machacek asked about a scenario in which a label said line dry only. Wouldn't that be a violation of the rule because it could also be machine dryable?

Ms. Vecellio replied no, if it says line dry to avoid shrinkage because the garment might be damaged if it were tumble dried.

Jessica Goodheart of the University of California - Los Angeles (UCLA) Wet Cleaning Demonstration Project, expressed her agreement with earlier comments that it is important to involve the garment and textile industry in the discussion and is happy they participated. She explained that is one reason that they invited the Gap to serve on their advisory committee, along with the President of the Fashion Industry Alliance in Los Angeles, the largest apparel manufacturing center in the country. Ms. Goodheart invited everyone to visit the Los Angeles wet cleaning demonstration site. They have washed more than 9,000 garments in a 100 percent wet clean shop and will be hosting tours through January 1997.

Ms. Goodheart asked if people from the textile and apparel industry feel they understand what wet cleaning is because it is a new technology. There is talk about multi-process wet cleaning, machine wet cleaning, and other new equipment. She also asked if there was any information that would facilitate the industry's adoption of the items being discussed at the seminar.

Ms. Villa responded to Ms. Goodheart's inquiry by explaining that although she has a degree in textile engineering and has a strong understanding of what wet cleaning is, she does not feel that information on wet cleaning has been exchanged adequately between the industries. She suggested that this kind of seminar facilitates full communication and allows others to learn about the textile industry, the way it is configured, the way it works, and how products are transferred down the chain to the consumers.

Dr. Wentz reiterated Ms. Villa's comments about the need to foster communication. He suggested, however, that the dry cleaning industry, a \$60 billion a year industry, is familiar with wet cleaning and understands the variables that affect textiles. He referenced a book that lists over 500 standards that describe the property changes or potential changes of textiles under variable conditions. Mr. Wentz explained that as a Design for the Environment stakeholder committee member and having worked as a member of the professional wet cleaning group that Mr. Weinberg alluded to, his



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Summary of Discussion

Session III (Continued)

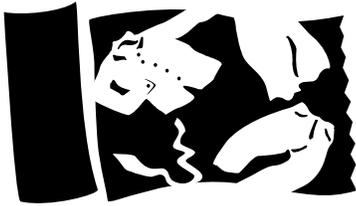
objective is to educate all parties. Dr. Wentz also explained that there is a difference between hearing and acting upon information. His objective when putting together the conference was to develop an objective basis for exchanging information between affected industries.

Dr. Wentz also mentioned the activities of the AATCC Committee. At their May 1996 meeting, they had over 30 people participating and he mentioned that it was Ms. Villa who introduced a motion that AATCC participate in the European Wet Cleaning Committee Round Robin Trial and that they participate in the International Activities to the Evolution and the Assessment of Wet Cleaning.

Dr. Charles Riggs of Texas Woman's University expressed his concern that a standard definition for wet cleaning does not currently exist. He suggested that the AATCC and ASTM develop a standardized definition of wet cleaning. Dr. Riggs warned that if people move ahead with new labels before developing a standard definition, everyone will be going in different directions.

Mr. Weinberg continued the discussion of a standard definition because he believes that the point has been reached where it has to occur. He also suggested that there is a lot of discussion about whether wet cleaning is a new or old cleaning method. While the technique may be old, there are new soaps, new machines, new processes, and a new revitalization of something that certainly looks new. Mr. Weinberg suggested that it is something that is significantly different from home laundering and that old wet cleaning methods might not have been. He stated his belief that what needs to occur is a move towards an operational definition of wet cleaning.

John Michener from Millikon pointed out that IFI often gets items into their laboratory that are label "dry clean," but the lab analysis reveals that the garment should have been laundered, it wasn't dry cleanable. All too often people are misusing care labels. Mr. Michener stressed the importance of having the apparel and the textile industries work with ASTM and AATCC as the test procedures are developed so that we can label apparel properly. On mislabeling, Mr. Michener said he did some research for IFI to find out if fabrics and garments originating in the United States had mislabeling problems or if it was mainly an import problem. It turns out that while the United States is about four times better than China in terms of proper labeling, there are some countries that are four times better than the United States. Mr. Michener didn't think the FTC was the place to go to for enforcement of proper labeling. Consumer Reports, Greenpeace, and other organizations probably get more media attention than the FTC. For Ms. Vecellio to do anything, she has to go into court and that's expensive for all concerned including those who have to pay a higher price for clothing as a consequence of the legal cost. He has seen what JC Penney does in the way of testing and they do a pretty good job of enforcement of proper labeling for the products that they sell. They are doing an enforcement job and that's something everyone should be doing. Information about companies that are mislabeling should be publicized.



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Summary of Discussion

Session III (Continued)

On the subject of wet cleaning, Mr. Michener expressed his concern about whether wet cleaning would get clothes as clean as dry cleaning. In the interest of the environment, we have eliminated phosphates, and that has made it more difficult to make effective detergents. Also, we have been dropping the temperature on our water heaters and that makes it more difficult to get our clothes clean. Mr. Michener said that for him, his environment starts with his underwear, and he wants his intimate environment to be clean. The data presented has focused on shrinkage and dye loss and not so much on cleanliness.

Doug Kelly of Boewe-Permac thanked the organizers, speakers, and moderators. He offered Boewe-Permac's assistance, and said he was sure many other manufacturers would be happy to assist with the process of producing proper care labels.

Jenni Cho from the Korean Youth and Community Center stressed the importance of reaching out to the Korean American population because they really are a significant part of the industry. She pointed out that the UCLA Wet Cleaning Demonstration Project is in partnership with Korean Americans. Ms. Cho said her organization is putting together Korean tours and also working on tours in Spanish, as many dry cleaning pressers are of Latino origin. They are trying to also establish a Korean demonstration site in the Los Angeles area. They are producing Korean brochures and flyers and information and would ultimately like to produce a bilingual video on wet cleaning in Korean and English. She noted that Los Angeles has the biggest population of Korean Americans and demonstration sites in other parts of the country might not have the same level of resources. She offered to provide copies of information in Korean that participants could pass on to train dry cleaners. She expressed interest in networking with other organizations in order to reach out to Korean Americans.

Ms. Patton closed the discussion by commenting that they had heard a lot of offers for exchange of information and assistance and asking Jan Connery to begin the final session focusing on the next steps to take.



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Final Summary and Discussion: Development of an Action Plan

Facilitator: Jan Connery,
Eastern Research Group

Summary

We are now at the final session of the roundtable where we are going to talk about developing an action plan. We have a tremendous opportunity with such a broad spectrum of stakeholders together for the first time, so this final session is a very important part of the roundtable. I'm going to start with a summary of the previous sessions and then I'll set forth the framework for the discussion.

During the first session, the theme was the activities that the U.S. Environmental Protection Agency (EPA) has initiated or catalyzed in this area. In particular, we heard about EPA's Design for the Environment (DfE) Program and their partnership for voluntary environmental improvement for the dry cleaning industry. That partnership was formed in 1992. They have made a lot of progress since that time, particularly in exploring the viability of wet cleaning and other alternative processes. Also, they've done extensive outreach concerning wet cleaning and they are working to help eliminate some of the barriers to moving these processes forward. We also heard that the integrated Cleaner Technologies Substitutes Assessment document will be out sometime next year.

From Dr. Riggs and Dr. Grady we heard about an EPA-sponsored research project to evaluate current technology and to identify and screen new technologies. Also, the project will seek to develop a universally accepted procedures to evaluate wet cleaning technologies and will provide input through the American Association of Textile Chemists and Colorists (AATCC) to update care labels.

The subject of the second session was textile care technology developments. We had number of very interesting presentations including some about exciting developments in Europe. Our first speaker was Josef Kurz. He talked about the textile care research in Germany concerning use of water cleaning and organic solvents in carbon dioxide. This research includes efforts to reduce the impact of wet cleaning on textiles and to optimize soil removal. Our next speaker was Manfred Wentz. He gave us a very comprehensive overview of the textile care technology spectra and the care labeling issues. He made three key points: the care labeling instruction should be based on objective rather than subjective criteria; all members of the apparel chain



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Final Summary and Discussion: Development of an Action Plan (Continued)

should be working together to optimize garment performance as new technologies emerge; and national and international organizations also need to work together. All of these themes were echoed by other participants.

Kaspar Hasenclever talked about professional wet cleaning in Europe. They have found that it provides better cleaning and smell, clearer colors, lower cost, enhanced service capabilities, and full customer satisfaction. Mr. Hasenclever also mentioned that a number of dry cleaners have had increases in their business since adding wet cleaning services to their portfolio. Another benefit of wet cleaning is that it might help catalyze the shift of some of the 90 percent of garments that are currently cleaned in a home to the dry cleaning industry, at least in Europe.

Our next speaker, Walther den Otter talked about the European Wet Cleaning Committee that was established in 1995. He spoke about their Round Robin Trial of two wet cleaning processes and another round robin that is planned for later this year. He stressed that the committee wants to cooperate with the North American institutions in getting an international test method and labeling system established as soon as possible.

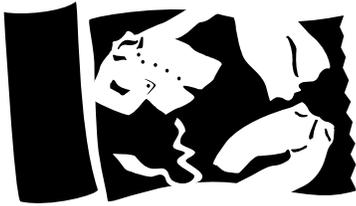
Helmut Kruessmann talked about the status of European care labeling. A number of issues have been resolved and a symbol for wet cleaning has been developed. He stressed that more information is needed about what articles can be damaged by the combination of water, detergent, and mechanical action.

Finally, yesterday we heard from Jo Patton about a 1-year demonstration project sponsored by the Center for Neighborhood Technology. It was a wet cleaning-only operation. One of the important results of that project was that they found the use of wet cleaning does not mean that you are simply shifting the air pollution concerns associated with dry cleaning to water pollution concerns. There was pretty much a clean bill of health there. Jo Patton also pointed out that wet cleaning is complex and more information is needed about what fibers and textiles work with wet cleaning.

The third session was about care labeling. We had a very interesting range of perspectives on that issue beginning with the origins of care labeling and comments from the Federal Trade Commission (FTC) and the American Society for Testing and Materials, then working through the textile industry, the apparel industry, the retailers, fabric care specialists, and finally consumers.

Connie Vecellio from the FTC talked about the current care labeling rule and efforts to change that rule, particularly with regard to labeling for wet cleaning. A couple of Federal Register notices have already come out asking for comment and the FTC will publish a notice of proposed rule making soon. Connie encouraged everyone to comment on the notice when it comes out.

Jo Ann Pullen from the American Society for Testing and Materials (ASTM) gave us a "tour" of the ASTM standard for care symbols. There is work to be



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Final Summary and Discussion: Development of an Action Plan (Continued)

done in harmonizing cleaning symbols with Europe and it sounds like there is the will to make this happen.

Kay Villa from the American Textiles Manufacturing Institute (ATMI) talked about her industry's perspectives on "eco-cleaning" developments. We learned that ATMI supports dual labeling of dry cleaning and "eco-cleaning," if it applies only to items that are normally dry cleaned. She expressed concern about the potential damage claims associated with the use of wet cleaning and stressed the need for more testing. We have heard that theme a lot in the past day and a half. She emphasized particularly that, for her industry, new cleaning methods require a new formulation and this will take time. She also stressed that we need to make sure that we are not solving one environmental problem by creating other problems somewhere up or down the chain.

Carl Priestland talked about the apparel industry's perspective on changes in care labeling. He said the apparel industry has a vested interest in good care labeling and he also stressed that any modification of the care labeling rule requires great care and time for the industry to adjust. He was one of the people that stressed that the U.S. labeling system needs to harmonize with international labeling — that we need one system worldwide.

Jennifer Holderness from the Gap gave us one retailer's perspective. There were a couple of concerns that she noted such as customer confusion regarding care labels and how can we best educate customers.

Our next speaker was Mary Scalco from the International Fabricare Institute. She made a number of very important points. Dry cleaners are on the front lines when there is damage and there is a need to educate dry cleaners about care labeling. She thought the care labeling rule needed to be better enforced and she echoed Manfred Wentz's statement that there needs to be a strengthening of the reasonable basis requirement.

Nancy Cassill gave us some very interesting facts about trends in consumer attitudes and perception related to care labeling. One of the bottom lines was we are going casual in the United States. She encouraged an integrated partnership and particularly recommended that the stakeholders representation in the future be expanded to include converters, importers, and exporters. She noted opportunities in the consumer trends and "eco-cleaning" developments for the fabric care industry. Dr. Cassill particularly recommended listening to consumers and learning from them as a means of maintaining a growing customer base. She also stressed the importance, as did others before her, of educating the consumers about the advantages of wet cleaning especially for casual apparel.

That brings us to this final discussion. First off all, it's striking to me that so much of the important activity that has been mentioned taken place in the past four years or less. It's all very recent and this whole "eco-cleaning" movement has acquired a very strong momentum in a short time. As Manfred Wentz mentioned there has been a paradigm shift and things are moving forward. Another point is, from what I've heard, there appears to be a consensus among the many stakeholders that these developments are good as long



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Final Summary and Discussion: Development of an Action Plan (Continued)

as the “eco-cleaning” processes are economically viable and acceptable to the consumer. Fabric care is a business and it has to succeed as a business, but as long as some of these environmentally friendly alternatives meet those two criteria everyone agrees this is a good area to move forward on. Also, a number of people have mentioned that it’s a very good thing that broad a spectrum of stakeholders are together. This is the first time that there has been such a broad spectrum working together. As someone recently said “working together will be the solution.” We would like to capitalize on that right now by using this final session to talk about how we might move “eco-cleaning” forward. We have called the session *Development of an Action Plan*. I would like to focus most of the time on an action plan to move things forward and reduce barriers to “eco-cleaning.”

Ohad Jehassi commented that using the phrase “eco-cleaning” to stand for environmentally friendly cleaning alternatives presents some difficulties because “eco-cleaning” used to mean something else a few years ago and eco clean is a registered trademark.

Jan Connery continued, by reiterating that in the final session most of the time will be spent talking about action ideas and then time will be spent talking about the mechanisms to move this forward. This forum has brought stakeholders together and there will be other forums in the future. Perhaps there are other ideas about how stakeholders can continue to work together.

There are a couple of things I would like to note about this session. I would like you to think about this as a brainstorming session. These are preliminary ideas. I hope people will feel free to put their ideas on the table and focus. While we won’t have a time to really fully explore every idea, the point here is to get some ideas on the table so they can be taken forward in other forums. And I would also like everyone to understand that if the idea is put forward that does not commit that person’s organization to following through on it.

We are particularly interested in opportunities and ideas for stakeholders to work together. And we want to be forward looking and action-oriented. Every idea has potential merit and we want to take note of it.



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Final Summary and Discussion: Development of an Action Plan (Continued)

Discussion

Robert Loop from Paxar Corporation, suggested that a newsletter be published that would focus both on the testing as well as apparel manufacturers.

Ken Adamson of Langley Parisian Limited, mentioned that a number of projects already exist including the Professional Wet Cleaning Partnership (PWCP) and the North Carolina State University (NCSU) and Texas Woman's University (TWU) joint research project.

Dr. Manfred Wentz of R.R. Street & Co. commented on Jan Connery's use of the abbreviation WC to stand for wet cleaning. He pointed out that in Germany WC stands for water closet, or toilet, so that perhaps it would be best to use a different abbreviation.

Mary Scalco with the International Fabricare Institute (IFI), extended IFI's education services to the conference participants, in particular through the PWCP, part of whose goal is education.

Jerry Tew of the American Association of Textile Chemists and Colorists (AATCC), noted that AATCC publishes a newsletter and a monthly magazine called *Textile Chemist and Colorist* (CH) that is goes all over the world. AATCC recently initiated a monthly update on environmental issues that will be included in CH. AATCC would be happy to include information about wet cleaning in those updates.

Bill Seitz of the Neighborhood Cleaners Association International (NCA-I) said that NCA-I has a monthly bulletin that is disseminated world-wide. He said he would be happy to add participants to that mailing list in order to keep them up-to-date with what NCA-I publishes on wet cleaning and dry cleaning. He added that NCA-I has a school, the New York School of Dry Cleaning with a complete wet cleaning facility including the most modern equipment. Mr. Seitz said he would be happy to give interested parties a tour of this facility to give them a better understanding of what the wet cleaning process is. NCA-I also offers wet cleaning courses to teach the dry cleaning industry.

Jack Weinberg proposed that an updated participants list with names and phone numbers and addressees be mailed out to everybody. Mr. Weinberg remarked that he would like the participants to find a way to continue working together based on specific goals that may take some time to define. There are some very specific common goals that a large portion of all the stakeholders can subscribe to and it may be possible to create the framework limited to those goals for ongoing work. He noted that a version of "eco-cleaning" may be such a common goal. Mr. Weinberg expressed his hope that U.S. Environmental Protection Agency (EPA) will be involved enough in the next period to help facilitate exploration of specific goals and changes.

Jody Siegel said she receives *Textile Chemist and Colorist* and is always looking for articles relevant to her work with the environment. She proposed that an



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Final Summary and Discussion: Development of an Action Plan (Continued)

action item be to publish in *Textile Chemist and Colorist* and any other relevant trade and technical publication. She also suggested that there be an effort to have speakers knowledgeable about wet cleaning and other alternatives speak at forums such as the AATCC international conference and dry cleaning trade shows.

Paula Smith of the Indiana Department of Environmental Management proposed that the first item on the action plan be to develop a definition of wet cleaning. She noted that many of the states including Indiana, Ohio, and Illinois have already developed their own definition of wet cleaning.

Ms. Smith also proposed further educating consumers on wet cleaning. A lot of dry cleaners don't want to advertise how much wet cleaning they do because they are afraid people will stop bringing items to their shops.

Dr. Wentz pointed out that the goal of the joint research project at NCSU and TWU is to develop objective data based on the scientific method rather than on the advocacy method. Dr. Wentz responded to Ms. Seigal's proposal about publications by noting that technical publications such as *Textile Chemist and Colorist* are peer reviewed. This assessment is based on objective evaluation rather than advocacy. Having scientific and research papers peer reviewed lends them credibility. The same review process is often involved at professional meetings.

Mr. Adamson proposed that one action item be to assess the resources already available such as ongoing committees to see if they adequately meet the need for creating sustained dialogue. There has to be a careful assessment of the mechanisms that currently exists and how they might be enhanced and preserved to insure that this dialogue continues.

Me. Weinberg said that he doesn't feel there is a clear distinction between objective science and advocacy. Many of the people on the research project's advisory board have very clear economic interests in certain outcomes and other outcomes are less well represented. He suggested that review processes be opened up to a larger number of stakeholders.

Jo Ann Pullen of the American Society for Testing and Materials (ASTM), pointed out that the United States is different from most other nations with respect to voluntary standards. In other nations, voluntary standards are developed in the private sector. ASTM is made up of producers, users, general interests, and consumers and is a broad forum for developing the standards needed for communication and business. A standard definition for professional wet cleaning that matches AATCC's and is reviewed by ASTM would be an appropriate part of ASTM's work. States are developing their own definitions and should be participating in voluntary standards group to develop a common definition. Ms. Pullen proposed that an action plan goal be that standards are in harmony in Europe, Japan, and North America, so that we are one global voice. She said the way to achieve this is through voluntary standards.



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Kay Villa of the American Textile Manufacturers Institute (ATMI) said that in order for ATMI to move forward with a clear definition of wet cleaning, it would help to have someone from the states coordinate a state position or at least put together some background information on the definitions that exist.

John Michener of Millikon, commented that one way to get information out quickly is by using the World Wide Web. He suggested setting up a web site where a wet cleaning definition could be discussed by a number of participants.

Connie Vecellio of the Federal Trade Commission (FTC), commented that most dry cleaners have not only participate in IFI and NCA-I, but they also have state trade associations with yearly conventions with speakers. She suggested that those conventions would be a great place to have speakers tell dry cleaners about professional wet cleaning.

Ms. Scalco responded that she thinks dry cleaners are well aware of what wet cleaning is. What is new to the dry cleaning industry is machine wet cleaning. IFI, NCA-I, as well as the manufacturers of wet cleaning equipment have been educating dry cleaners about how to use this equipment. What hasn't occurred is that type of outreach and education directed toward the textile and the apparel manufacturers. Although, both AATCC and ASTM have formed wet cleaning committees and are already working on that particular issue.

Ms. Vecellio responded that she had not meant to suggest that dry cleaners don't know about wet cleaning. Ms. Vecellio stressed that what the FTC needs in order to produce a new label for wet cleaning is a definition of what professional wet cleaning is as opposed to washing—a definition for what a professional cleaner can do that someone can't do in their home.

Mr. Seitz commented that almost all conferences held by cleaning industry today have a significant amount of wet cleaning technology being presented to the dry cleaning industry.

Ms. Villa requested that the Center for Neighborhood Technology (CNT) and the University of California-Los Angeles Program provide her with literature, background studies, or information that she could disseminate to ATMI's members.

Ohad Jehassi of EPA, noted that EPA would be publishing and distributing the proceeding of the Apparel Care and the Environment conference which would include participants names and addresses. He also asked for comments on the best way to follow up on the momentum of this conference. He also commented that EPA's role next year is somewhat uncertain as to how active they are going to remain with this project.

Ms. Vecellio commented that, for the purposes of the Care Labeling Rule, FTC need to distinguish between things that can be home laundered and things that could be washed in water but by a professional. If a professional has special knowledge, chemicals, or finishing equipment that a consumer



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wouldn't have, that could be part of the description. It does not necessarily have to include a machine. The key is to make a distinction between home laundering and laundering that has to be done by a professional.

Dr. Wentz observed that a consensus process is used whenever a national or international standard is developed. He indicated that AATCC would be integrating proposed definitions being developed in Europe as consensus is pursued in the United States.

Mr. Weinberg expressed concern that the definition might incorporate all kinds of equipment, which would mean that less things are wet cleanable than if a definition required a certain more sophisticated kind of equipment. He observed that the definition of wet cleaning and how it interfaces with equipment may impact what proportion of clothes will be able to get that label.

Mr. Weinberg encouraged all the people involved in the discussion to participate in the consensus process. He also emphasized how important it is for EPA to continue its support of the wet cleaning project. He observed the meeting had initiated a new dialogue on the issues and noted that there appears to be agreement on the need for changes in clothing care practice driven by environmental and other concerns.

Ms. Seitz agreed with Mr. Weinberg that it is important to continue the dialogue initiated at the meeting. He suggested another roundtable with broadened participation in early in 1997.

Ms. Pullen commented that it is good to consider the state definitions, models for definitions in the FTC rule, and AATCC and ASTM's standard definitions, all of which serve as good models. She indicated that AATCC and ASTM have worked closely together on developing consensus definitions and that will continue to do so with definitions for professional wet cleaning.

Patrick Gouveia of Navy Clothing And Textile Research, urged everyone to contact their corporate leaders, Congressional representatives, and state government officials to provide EPA with the funding to continue the project. He shared that the Navy is involved in discussing a uniform testing project with Dr. Riggs at TWU, using the wet cleaning. Dry cleaning is a concern to the Navy, which is the biggest user of dry cleanable items in the Department of Defense. He indicated that he has already petitioned the Secretary of the Navy for funding to help support the effort.

In her closing summary Jan Connery of Eastern Research Group, Inc., observed that there had been a number of very specific suggestions regarding enhancing communication. She noted a strong will expressed to proceed into the future and to stay in touch and to find other venues to continue working together. She also remarked on suggestions about outreach to dry cleaners and ideas around the need to develop the standard definition for wet cleaning. She thanked everyone for their participation, particularly the speakers.



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Mr. Jehassi thanked the speakers for their excellent presentations and the attendees for their thoughtful questions and comments. He said he appreciated the feedback indicating that the forum had been a positive, open, and honest dialogue. He stated that everyone has a role to play in preventing pollution and expressed his hope that the dialogue that had been started will help move toward the mutual goal of both improving the environment and continuing to satisfy customers needs.